

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

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MUNA AL-SUYID, individually and on behalf of the estates of her family members ABDEL SALAM	:	
AL-SUYID, IBRAHIM AL-SUYID, KHALID	:	
AL-SUYID and MUSTAFA AL-SUYID, and	:	
ABDALLA AL-KRSHINY, AHMAD AL-KRSHINY,	:	
MAHMUD AL-KRSHINY,	:	
and IBRAHIM AL-KRSHINY, individually	:	
and on behalf of his family member ALI AL-KRSHINY	:	
and MUSTAFA AL-KRSHINY,	:	
	:	Civil Action No.
	:	1:20-cv-00170-LMB-JFA
Plaintiffs,	:	
	:	
v.	:	
	:	
KHALIFA HIFTER, KHALID HIFTER, and SADDAM HIFTER	:	SEPTEMBER 1, 2020
	:	
Defendants.	:	
	:	

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**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7(I), Muna al-Suyid (individually and on behalf of the estates of her father Abdel Salam al-Suyid, and her brothers Ibrahim al-Suyid, Khalid al-Suyid, and Mustafa al-Suyid), Plaintiffs Abdalla al-Krshiny, Ahmad al-Krshiny, Mahmud al-Krshiny, and Plaintiff Ibrahim al-Krshiny (individually and on behalf of the estates of his brothers Ali al-Krshiny and Mustafa al-Krshiny) (collectively “Plaintiffs”) respectfully moves this Court for an extension of time until Wednesday, September 10, 2020, to file their response to Defendants’ Motion to Dismiss or, in the Alternative, for Summary Judgment (the “Motion”) (ECF Nos. 38–39). Relatedly, Plaintiffs further request that the notice

for hearing of the Motion be moved from September 15, 2020 at 10:00 a.m. until September 29, 2020, at the same time.

Plaintiffs moved for default judgment against defendants Khalifa Hifter, Khalid Hifter, and Saddam Hifter (collectively, “Defendants”) on May 22, 2020 (ECF No. 27). Pursuant to 28 U.S.C. § 636(b)(1)(C), U.S. Magistrate Judge John F. Anderson recommended that default judgment be entered in favor of Plaintiffs in the total amount of \$80,000,000 on June 17, 2020 (ECF No. 31). On August 20, Defendants moved for dismissal of all claims brought against them pursuant to Rule 12(b)(1), (5), and (6) of the Federal Rules of Civil Procedure or, in the alternative, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure (ECF No. 38); in support thereof, Defendants filed an accompanying Memorandum of Law and Proposed Order (ECF No. 39) (collectively, the “Motion”).

The deadline for Plaintiffs to file their Response is currently September 3, 2020. Due to the schedule of lead counsel for Plaintiffs, Plaintiffs’ counsel respectfully submits that they cannot adequately respond to the Motion absent the requested extension. This is Plaintiffs’ first motion to extend a deadline. Plaintiffs make this request in good faith and not for the purpose of undue delay.

In light of its request for an extension of time to respond to Defendants’ Motion, Plaintiffs’ further request that the notice for hearing Defendants’ Motion also be extended from September 15, 2020 at 10:00 a.m. (ECF No. 40) until September 29, 2020 at 10:00 a.m.<sup>1</sup>

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<sup>1</sup> This request does not alter Plaintiffs’ counsel’s initial request that the parties be permitted to appear remotely – whether by video or telephone – for a virtual hearing, given the personal and public health concerns associated with the pandemic (ECF No. 40).

Plaintiffs' counsel conferred with Defendants' counsel, who consents to the requested extensions of time.

For the foregoing reasons, Plaintiffs respectfully request that this Court grant Plaintiffs' unopposed request for extensions of time (1) up to and including September 10, 2020 to respond to Defendants' Motion and (2) to September 29, 2020 at 10:00 a.m. to hold a hearing on Defendants' Motion.

Respectfully Submitted,

Dated: September 1, 2020

Kevin T. Carroll  
Kevin T. Carroll (VSB#95292)  
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	:	
Defendants.	:	
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**[PROPOSED] ORDER GRANTING  
CONSENTED TO MOTION FOR EXTENSION OF TIME**

Upon the Motion of Muna al-Suyid (individually and on behalf of the estates of her father Abdel Salam al-Suyid, and her brothers Ibrahim al-Suyid, Khalid al-Suyid, and Mustafa al-Suyid), Plaintiffs Abdalla al-Krshiny, Ahmad al-Krshiny, Mahmud al-Krshiny, and Plaintiff Ibrahim al-Krshiny (individually and on behalf of the estates of his brothers Ali al-Krshiny and Mustafa al-Krshiny) (collectively “Plaintiffs”) for entry of an Order granting its Consented to Motion for Extension of Time (the “Motion”); and it appearing that good and sufficient notice of the Motion has been given to all parties entitled to receive notice of the Motion, and that no further notice is necessary or required; after due deliberation and good cause appearing to grant the relief requested in the Motion; and for good cause shown;

**IT IS HEREBY ORDERED** that the motion is **GRANTED** and that the deadline for Plaintiffs' response to Defendants' Motion to Dismiss or, in the Alternative, Motion for Summary Judgment ("Motion to Dismiss") is hereby extended to September 10, 2020; and

**IT IS FURTHER ORDERED** that the notice for hearing of Defendants' Motion to Dismiss – at which, counsel and the parties are permitted to appear remotely by video or telephone – be moved to September 29, 2020 at 10:00 a.m.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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United States District Judge